

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

IN RE:	§	
	§	CASE NO. 23-30067-hcm
A&R CHAVIRA, LLC,	§	
	§	
DEBTOR.	§	CHAPTER 11

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**NEXTGEAR CAPITAL, INC.'S WITNESS AND EXHIBIT LIST**

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TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NextGear Capital, Inc. ("NextGear") files this its Witness and Exhibit List in connection with the hearing set for February 22, 2023 at 1:30 p.m. (MST) on NextGear Capital, Inc.'s Motion for Relief from Automatic Stay Regarding Motor Vehicle Inventory [Doc. # 13], as follows:

**WITNESSES**

NextGear reserves the right to call the below referenced witnesses for testimony at the hearing including the following:

**Christopher V. Arisco**  
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*Attorney for NextGear*

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*Representative for NextGear*

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*Attorney for Debtor*

NextGear reserves the right to call any other witness designated or identified by any other party at the hearing for purpose of examination at the hearing and/or any rebuttal witness.

**EXHIBITS**

<b>Ex. #</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted</b>	<b>Disposition</b>
NG-A	Affidavit of Lucas Hancock				
NG-B	Demand Promissory Note and Loan and Security Agreement				
NG-C	UCC-1 Financing Statement filed on April 26, 2018, file number 18-0014649972				
NG-D	NextGear's Receivable Detail Summary dated February 7, 2023				
NG-E	List of Sold Unpaid Units (provided by Debtor)				

NextGear reserves the right to amend its Exhibit List and/or supplement the same. NextGear further reserves the right to introduce any document designated by any other party in-interest, as well as any rebuttal documents.

**Respectfully Submitted,**

PADFIELD & STOUT, L.L.P  
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Phone: 817-338-1616  
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/s/ Christopher V. Arisco  
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*Attorneys for NextGear Capital, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned converted the foregoing document into an electronic image, via portable document format (.pdf), electronically submitted same to the Internet web portal for the Clerk of this Court utilizing the Electronic Management and Electronic Case Filing system of the Court, which has caused service, via Simple Mail Transfer Protocol (e-mail), of a Notice of Electronic Filing of this imaged document to the below-identified parties on Thursday, February 16, 2023; said e-mail provides an attributable hyperlink to the document, in portable document format, except for Debtor(s), and any other entity so identified below or on the EM/ECF filing sheet, whereas in that instance such document was mailed via First Class United States Mail, to-wit:

<b>A&amp;R Chavira, LLC</b> 6900 Gateway Blvd. East El Paso, Texas 79915  <i>Debtor</i>	<b>Carlos A. Miranda</b> Miranda & Maldonado, P.C. 5915 Silver Springs, Bldg. 7 El Paso, Texas 79912  <i>Attorney for Debtor</i>
<b>United States Trustee</b> 615 E. Houston, Suite 533 San Antonio, Texas 78295	<b>All those receiving ECF notification in this case.</b>

/s/ Christopher V. Arisco  
Christopher V. Arisco